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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

JEREMY STANFIELD, ROMONIA
PERSAUD, SHABNAM SHEILA
DEHDASHTIAN, SAIRA LOSOYA, AND
EVA WILLIAMS, individually, on behalf of
all others similarly situated, and on behalf of
the general public,

Plaintiffs,

v.

FIRST NLC FINANCIAL SERVICES, LLC,
and DOES 1 through 50, inclusive,

Defendants.

Case No. C 06-3892 SBA JL

**STIPULATION AND ORDER
CONTINUING PHASE ONE
DISCOVERY CUT-OFF DATE
CIV. L.R. 6-2(a)**

Judge: Hon. Sandra Armstrong
Date Action Filed: June 22, 2006

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PURSUANT TO LOCAL RULE 6-2(a), Plaintiffs Jeremy Stanfield, *et al.* and Defendant First NLC Financial Services, LLC (collectively, “the parties”) stipulate as follows:

WHEREAS, the April 13, 2007 Order (Dkt. #236) sets the phase one class certification discovery cut-off as July 12, 2007;

WHEREAS, the parties have been conducting written and deposition discovery throughout the discovery period;

WHEREAS, the parties have been actively engaged in mediation of this case, including an in-person conference in Williamsburg, Virginia, on April 11, 2007, and continuing negotiations throughout the subsequent weeks, to the present;

WHEREAS, in light of the parties’ focus on mediation, the parties stipulate that phase one discovery should be continued from July 12, 2007 to August 28, 2007;

WHEREAS, the parties’ stipulation should not affect the other dates in the Court’s Order for Pretrial Preparation, dated December 21, 2006 (Dkt. #146);

WHEREAS, nothing by this stipulation or any other written or oral agreement by First NLC shall be construed as an admission or a waiver that class certification or a collective action for any of these job positions identified in Plaintiffs’ complaints or in this case is appropriate;

IT IS HEREBY STIPULATED by and between the parties to this action through their designated counsel as follows:

The parties respectfully request that this Court modify Paragraph A of the December 21, 2006 Order for Pretrial Preparation as follows: “All phase one discovery, except for expert discovery, shall be completed and all depositions taken on or before **8/28/07**. The parties are

1 responsible for scheduling discovery so that motions to resolve discovery disputes can be heard
2 before the above discovery cut-off.”

3 Dated: May 17, 2007

4 NICHOLS KASTER & ANDERSON, LLP

5 /s/
6

7 By: _____

8 Bryan J. Schwartz

Attorneys for Plaintiffs and Representative Plaintiffs

9 Dated: May 17, 2007

10 ORRICK, HERRINGTON & SUTCLIFFE LLP
11 NELSON MULLINS RILEY & SCARBOROUGH
12 LLP

13 /s/

14 By: _____

15 Attorneys for Defendant

First NLC Financial Services, LLC

16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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19 Dated: 5/23/07

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21 Honorable Sandra Armstrong
22 United States Magistrate Judge
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